

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION

DONNA SCHUTTE,

Plaintiff,

v.

ABC INSURANCE CO.,
PROHEALTH CARE, INC.,
and DEF INSURANCE CO.,

Defendants,

Case No.: 21-CV-204

PROHEALTH CARE, INC.,

Third-Party Plaintiff,

v.

CIOX HEALTH, LLC,

Third-Party Defendant.

**STIPULATION TO STAY PROCEEDINGS PENDING WISCONSIN SUPREME
COURT DECISION IN *BANUELOS V. UNIVERSITY OF WISCONSIN
HOSPITALS AND CLINICS AUTHORITY***

Plaintiff Donna Schutte, Defendant ProHealth Care, Inc., and Third-Party Defendant Ciox Health, LLC, by their respective undersigned counsel, hereby stipulate that Ciox's April 27, 2022 Motion to Stay (ECF No. 58), in which ProHealth Care joins (ECF No. 61), may be granted and all proceedings in this case may be stayed pending the

Wisconsin Supreme Court's decision in *Banuelos v. University of Wisconsin Hospitals and Clinics Authority*, Case No. 2020AP1582.

ProHealth Care and Ciox further stipulate that if they are now aware, or in the future become aware, of any class action in either state or federal court that brings claims against either (1) ProHealth Care or (2) ProHealth Care's agents, relating to ProHealth Care's charging of "paper copy" rates under Wis. Stat. § 146.83(3f)(b)1. for electronic copies of patient health care records, ProHealth Care and/or Ciox will promptly notify Cannon & Dunphy, S.C. of the existence of such action(s). However, ProHealth and Ciox are not obligated to report any action in which Cannon & Dunphy, S.C. represents a party.

Dated this 27th day of May, 2022.

s/ Brett A. Eckstein
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